

Message

From: Judge, Robert [Judge.Robert@epa.gov]
Sent: 4/19/2017 6:44:43 PM
To: Compher, Michael [compher.michael@epa.gov]
Subject: RE: URGENT ACTION – Invalidation of Ozone data in AQS due to QC issues

Thanks-.

The piece that has held me a up a little was figuring out what to do in the event some State argues that some of the data is good due to “compelling evidence.” (As I said on the call, I already know of at least one example of that)

From: Compher, Michael
Sent: Wednesday, April 19, 2017 1:42 PM
To: Judge, Robert <Judge.Robert@epa.gov>
Subject: FW: URGENT ACTION – Invalidation of Ozone data in AQS due to QC issues

Hi Bob – Hearing the discussion on the call, I thought you’d be interested in the State outreach and plan we are taking to implement this in R5.

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Region 5 Air and Radiation Division
U.S. Environmental Protection Agency
Phone: 312-886-5745

From: Compher, Michael
Sent: Tuesday, April 18, 2017 4:59 PM
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Subject: URGENT ACTION – Invalidation of Ozone data in AQS due to QC issues

All (State monitoring and QA Managers) ,

As a result of the Office of Inspector General (OIG) Management Alert issued February 6, 2017, EPA has initiated several corrective actions. One of the follow up actions is to assess the suitability of ozone data for regulatory decisions. In doing this, OAQPS identified all instances of 1-point QC checks (2013 to 2016) for ozone that are outside the critical criteria in the QA Handbook and/or limits contained in approved QAPPs. They have also identified the routine ambient data surrounding the 1-point QC checks that should be null coded in AQS so that the underlying design values supporting the designations process are based on valid data.

OAQPS has requested that EPA regional offices work with affected monitoring organizations to remove any routine data (and its associated 1-point QC check) that does not meet the acceptance criteria in their EPA-approved QAPP and for which no compelling reason or evidence exists to consider the data valid. For this review, I want to clarify that a default decision to invalidate data when critical criteria fail is not the expectation. We want you to consider the compelling

reasons/evidence and we want to review that information to ensure that the decisions are appropriate and consistently applied.

OAQPS divided the list into two phases. Phase 1 (sites in IN, OH, MI and MN) includes high priority monitors whose 2014-2016 design value would change or become incomplete due to the data invalidations. These need to be addressed in AQS by May 1st. Phase 2 (all R5 states) includes the remaining monitors that will have similar data invalidation actions are coded as Phase 1 in the Excel table, but have a less immediate impact on designations. Phase II needs to be addressed by August 1st, 2017.

The most pressing issue at hand is to review the Phase I data identified in the attached spreadsheet, and ensure that routine ozone data and the associated 1-point QC check for *Phase 1 monitors* (Column H—see attachment) are properly validated and reported in AQS. Below, we have outlined the next steps to be taken:

1. Region 5 will schedule a call for Thursday, April 20, 2017 with all of you to provide further detail, and to answer any questions.
2. Please review the attachment "Region5_Ozone_Data_Invalidations_2013-2016". Each agency needs to identify whether they intend to keep or remove each block of data identified by OAQPS, and provide a rationale for either decision. To track and document this, we suggest populating the two columns labelled "Proposed Action for Affected Data" (e.g. invalidate) and "Rationale" in the "Data Invalidations" worksheet of the attached xls file. **At this time, give priority to monitors identified as 'Phase 1'.**
3. Region 5 will schedule one-on-one calls starting Monday, April 24, 2017 with States to discuss the monitors identified in Phase 1, and your proposed action and rationale provided in the xls file. We will follow up at a later date to discuss monitors identified as Phase 2.
4. After our discussions with each State and by May 1st, we need you to reflect the outcomes of your assessment and our discussions in AQS for the Phase 1 monitors.

As our Regional QA Coordinator for Air Monitoring, Bilal Qazzaz will be our primary R5 contact. We will continue to coordinate with those included in this message (State Monitoring and QA Managers), unless we receive a reply that someone else in your organization should be the primary contact. This has a very short turn-around and could take considerable time depending on how many monitors are on your State's list. We appreciate your attention and responsiveness.

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